

JOSEPH R. DONAHUE, LLC

ATTORNEYS

JOSEPH R. DONAHUE*
JDONAHUE@DONAHUENJLAW.COM
MOBILE: (201) 602-4692

OF COUNSEL
SANDRA COIRA

LUCIA V. DONAHUE

* CERTIFIED CRIMINAL TRIAL LAWYER – NJ

135 PROSPECT STREET
RIDGEWOOD, NEW JERSEY 07450
TELEPHONE: (201) 488-7707
FACSIMILE: (201) 488-9559
WWW.DONAHUENJLAW.COM

October 17, 2024

Via ECF Filing

Hon. Michael E. Farbiarz, USDJ
M.L.K Federal Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: US v. Contents of JP Morgan Chase Acct. Ending in 9483, et al.
Civil Action No. 2:24-5863-MEH-MAH**

Dear Judge Farbiarz:

I represent Hee Ah Nam, the Claimant and Petitioner relevant to the above-referenced matter. The Government has filed a Motion to Dismiss returnable November 4, 2024 before Your Honor. My opposition papers are due on October 21, 2024. Please accept this letter as a request to adjourn the motion for one additional cycle and to extend the deadline for the filing of our opposition. AUSA Laserna has no objection to this request. I have asked for one previous adjournment.

The parties are engaged in productive settlement discussions to fully resolve this civil forfeiture action and anticipate that the settlement discussions can be completed within the next 30 days. For this reason, earlier this week the parties put in a joint request to postpone the current discovery deadlines for 30 days that was granted by Judge Hammer. It is submitted that postponing the Government's pending motion for one additional cycle will conserve judicial resources, in the event that this matter can be resolved by settlement.

Respectfully submitted,

Joseph R. Donahue

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cc: Peter A. Laserna, AUSA (via ECF filing)